



FILE

April 9, 2013

Dr. Richard E. Helton
President
Vincennes University
Welsh Administration Building
1002 North First Street
Vincennes, IN 47591-1523

Certified Mail Return Receipt Requested
7008 0150 0003 0158 5690

RE: Expedited Final Program Review Determination Letter
OPE ID: 00184300
PRCN: 201310528153

Dear Dr. Helton:

From December 10, 2012 through December 14, 2012, Herschel Wallace, Sheri Wild and Oksana Apanovich conducted a review of Vincennes University's (Vincennes) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The purpose of this Final Program Review Determination Letter is to close the program review.

The focus of the review was to determine Vincennes's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of Vincennes' policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011-2012 and 2012-2013 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Vincennes' specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures.

Federal Student Aid, Chicago/Denver School Participation Division
500 West Madison Street, Suite 1576
Chicago, Illinois 60661
www.FederalStudentAid.ed.gov

Furthermore, it does not relieve Vincennes of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

The Chicago/Denver School Participation Division has made a Final Program Review Determination concerning the findings that were identified during the program review. Following is a discussion of the findings identified and the resolution of those findings.

Program Findings and Final Program Review Determinations:

Finding #1: Incorrect Return of Title IV Funds

34 C.F.R. § 668.22 of the Student Assistance General Provisions regulations requires an institution to calculate refunds in accordance with the measures outlined in the specific refund formulas, that are contained in that section. Failure to calculate refunds correctly could result in students either receiving a windfall of federal funds or a loss of federal funds to which they are entitled. In addition, the incorrect calculations could cause increased expenses to the Department.

Noncompliance:

Student #15 withdrew from Vincennes on 5/18/2012. As a result of the R2T4 calculation performed for the student, the institution returned \$1345.00 in Federal Direct Stafford Loan funds on 5/23/2013. The calculation improperly excluded additional book charges of \$550.28.

Institutional Action Taken to Resolve Noncompliance:

Upon discovering the R2T4 calculation error, the institution returned \$358.00 in Federal Subsidized Stafford Loan funds on 10/05/2012. On 12/13/2012 the institution returned additional \$24.00 in Federal Subsidized Stafford Loan funds through Common Origination & Disbursement system.

Final Program Review Determination: Vincennes has taken the corrective action necessary to resolve this finding. Therefore, no further action is required and Vincennes may consider this finding closed.

Finding #2: Late Return of Title IV Funds

The Student Assistance General Provision regulations at 34 C.F.R. § 668.22(j)(4), provides that a return of Title IV, FSA funds due to or on behalf of a student must be paid within 45 days after the date that the student withdraws or otherwise terminates his or her enrollment.

Noncompliance:

Student #15 withdrew from Vincennes University on 5/18/2012. The institution returned \$1345.00 in Federal Direct Subsidized Loan Funds on 5/23/2013. The original R2T4 calculation

performed for Student #15 was short by \$382.00. The return was due on June 26, 2012. Vincennes returned additional \$358.00 for Student #15 on 10/05/2012.

Institutional Action Taken to Resolve Noncompliance:

Vincennes returned \$358.00 in Federal Subsidized Stafford Loan funds on 10/05/2012. On 12/13/2012 the institution returned additional \$24.00 in Federal Subsidized Stafford Loan funds through Common Origination & Disbursement system.

Final Program Review Determination:

The institution is liable to the Federal Subsidized Stafford Loan program for the cost of funds and accrued interest charges resulting from its improper retention of Title IV funds. Since the amounts of these liabilities were calculated to be minimal, no demand for payment is made at this time. No further action is required and Vincennes may consider this finding closed.

Funding #3: Return To Title IV Policy Not Developed/Inadequate

34 C.F.R. § 668.16(b)(4) states that to begin and to continue to participate in any Title IV, HEA program, an institution shall demonstrate to the Secretary that the institution is capable of adequately administering that program under each of the standards established in this section. The Secretary considers an institution to have that administrative capability if the institution designates a capable individual to be responsible for administering all the Title IV, HEA programs in which it participates and for coordinating those programs with the institution's other Federal and non-Federal programs of student financial assistance. The institution must also have written procedures for or written information indicating the responsibilities of the various offices with respect to the approval, disbursement, and delivery of Title IV, HEA program assistance and the preparation and submission of reports to the Secretary.

Noncompliance:

Vincennes' Return To Title IV policy contained a statement that institutional costs are not included into the R2T4 calculation.

Institutional Action Taken to Resolve Noncompliance:

Vincennes corrected the statement regarding institutional costs on 12/13/2013.

Final Program Review Determination:

No further action is required and Vincennes may consider this finding closed

Record Retention: Program records relating to the period covered by the program review must be retained until the later of: Resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. If you have any questions concerning this report, please call Oksana Apanovich at (312) 730-1686.

Sincerely,

(b)(6)

Douglas A. Parrott
Director

cc: Dr. Stanley J. Werne, Financial Aid Director
North Central Association of Colleges and Schools-CIHE (Higher Educ)
IN Commission for Higher Education

Appendix A: Student Sample

2011-2012

	Student's Name	Student's SSN (last four digits only)
1.	(b)(6)	
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		

2012-2013

	Student's Name	Student's SSN (last four digits only)
16.	(b)(6)	
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		